



Verizon Communications  
1300 I Street NW, Suite 400W  
Washington, DC 20005

February 25, 2002

**Ex Parte**

William Caton  
Acting Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. – Portals  
Washington, DC 20554

*RE: Application by Verizon-New Jersey Inc. for Authorization To Provide In-Region,  
InterLATA Services in State of New Jersey, Docket No. 01-347*

Dear Mr. Caton:

Yesterday, C. Odom, L. Vial, R. Ellis, K. McLean and J. Groves of Verizon met with A. Johns, B. Childers, B. Olson and J. Miller of the Common Carrier Bureau to discuss Verizon's February 25, 2002 ex parte regarding OSS. The staff also requested additional information clarifying certain issues raised by ATX in the above-referenced docket. This letter responds to that request.

UNE Analog PBX Trunks: As Verizon explained previously (*see* McLean/Wierzbicki/Webster Reply Decl. ¶ 17), when a CLEC ordered UNE analog PBX trunks, the CLEC submitted both an electronic LSR and, in addition, faxed a supplemental questionnaire with additional information for each order. The questionnaire requested additional detail that Verizon needs in order to provision analog PBX trunks. As previously explained, Verizon has implemented the industry-standard guidelines and formats for ordering pursuant to the Change Management Process, *see* McLean/Wierzbicki/Webster Decl. ¶¶ 54-55, 133-142. The industry standard electronic LSR, which was developed by the industry standards organizations (*see* McLean/Wierzbicki/Webster Decl. ¶ 29) has no fields designated to provide the information Verizon needs. (The specific information that Verizon requires is the number of digits that are outputted by the end user's PBX equipment. As a result, Verizon requested that the CLEC provide the information (along with other information identifying the order to which the supplemental information applied) through the supplemental fax.

As we explained previously (*see* McLean/Wierzbicki/Webster Reply Decl. ¶ 17), Verizon was working with ATX to develop alternatives to the supplemental fax, including ways for CLECs to provide the required information electronically. Verizon has now implemented a new process that will allow CLECs to use the "Remarks" field on the LSR to communicate the necessary information to Verizon. Verizon will then generate the supplemental form internally and forward it to the provisioning forces. *See* attached communication to ATX. This policy is applicable to all CLECs and a Change Management notification will go out shortly. In addition, the industry standards committee responsible for LSOG has included specific fields in the guidelines for LSOG 6 that will accommodate the information needed to order this product.

Conversion from Resale to UNE: When a CLEC that serves an end user by reselling Verizon's retail service wants to convert that end user to a UNE platform, the conversion is not a "simple records change" for Verizon. McLean/Wierzbicki/Webster Reply Decl. ¶ 19. Because a UNE platform is a combination of individual unbundled elements, Verizon must ensure that its records contain the correct inventory of the individual UNE facilities associated with the combination purchased by the CLEC to serve its end user. *Id.* Subsequent changes to the end user's account, and any necessary repair activities, will be impeded if the customer's configuration is not detailed correctly. *Id.*

Verizon retail records are not designed for the purpose of providing the full UNE inventory. Moreover, Verizon's retail records may not have up-to-date information concerning the end user's service, after the original provisioning by retail, especially for older services such as analog PBX trunks and FX lines. Even if there is "no change," there can be specific information about the end user's service that is not detailed on the Verizon retail service record. For example with FX service, it is important to know the originating Central Office, but with Local Number Portability, the end user's NXX may no longer reflect the true originating C.O. As a result, in order to create the appropriate inventory of UNE facilities, and to provision the service correctly, Verizon requires additional information about the service the CLEC will provide to the end user. In its wholesale role, Verizon does not contact the end user for additional or confirming information; instead, it needs to get such information from the CLEC. *Id.*

The twenty-page limit does not apply as set forth in DA 01-2746. If you have any questions, please do not hesitate to call me.

Sincerely,



Clint E. Odom

Attachment

cc: A. Johns  
J. Miller  
B. Olson  
S. Pie  
B. Childers

The following documents the Centrex and Analog PBX trunk ordering information that Verizon discussed with ATX on February 6.

### **Centrex and Assume Dial 9 Centrex**

Verizon will accept both “as is” and “as specified” transactions for these services. This was outlined in the original letter sent to the CLECs introducing these services. Furthermore, in response to ATX’s request to eliminate the Centrex forms associated with the LSR, Verizon agrees to generate the provisioning forms internally upon receipt of an error free LSR. Although ATX hasn’t requested this, we will eliminate the requirement for a CLEC to generate the forms for new Centrex service as well. Verizon will also generate the forms for new service.

With the elimination of the forms on “as specified” and new transactions ATX must populate the correct features and feature codes on the LSR so that Verizon will be able to provision the service correctly. Failure to populate all of the required ordering codes will result in queries.

### **Analog PBX trunks (DID, DOD, 2 Way)**

Verizon has accepted both “as is” and “as specified” transactions for these services since they became available for platform. This was outlined in the original letter introducing these services. We do not require any additional forms for any new, “as is” or “as specified” DOD and 2 Way transactions or “as is” DID transactions. At ATX’s request, Verizon agrees to internally generate the form on new and “as specified” DID transactions if ATX agrees to populate the “Number of digits outpulsing” in the remarks of the LSR. This information is required for provisioning and, if not populated, will result in a query to the CLEC. Additionally, Verizon has already brought this issue to the Ordering and Billing Forum to add the field to a future LSR version.